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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

WILLIAM DEANS, an individual,

Plaintiff,

vs.

LAS VEGAS CLARK COUNTY LIBRARY
DISTRICT; RONALD R. HEEZEN, (in his
official capacity); JANE DOE; JOHN ROE; and
JANE POE,

Defendants.

Case No. 2:16-cv-02405-APG-PAL

**STIPULATION AND (PROPOSED)
ORDER TO EXTEND TIME TO FILE
AMENDED COMPLAINT**

(Second Request)

Plaintiff William Deans (“Plaintiff” or “Mr. Deans”) and Defendants Las Vegas-Clark County Library District and Ronald R. Heezen (“Defendants”) (collectively, the “Parties”), by and through their respective, undersigned counsel, do hereby stipulate and agree to extend the date by which Mr. Deans shall file his amended complaint, and the date by which Defendants shall file responses to Mr. Deans’s amended complaint. Mr. Deans is currently required to file his amended complaint on or before December 30, 2016.

1. On November 7, 2016, the parties filed their Stipulation and Order to File Amended Complaint (ECF No. 22), in which Mr. Deans agreed to file an Amended Complaint within 20 days of the Court filing its Order on the then-pending Motion for Preliminary Injunction. By the terms of the stipulation, Defendants were excused from filing an answer to the original Complaint, and would have 20 days to respond to the Amended Complaint. The Court ratified this stipulation on November 8, 2016.

1 2. Two days later, on November 10, 2016, the Court filed its Order granting in part
2 and denying in part Mr. Deans's Motion for Preliminary Injunction (ECF No. 25).

3 3. On November 23, 2016, Mr. Deans moved this Court for his first extension of
4 time in which to file his amended complaint so that the Parties could engage in settlement
5 discussions. (ECF No. 28).

6 4. The Court granted Mr. Deans's request on November 28, 2016, which delayed the
7 date by which he must file an amended complaint from November 30, 2016 until December 30,
8 2016. (ECF No. 29).

9 5. Since then, the Parties have continued to engage in settlement discussions which,
10 if ultimately fruitful, could obviate the need for Mr. Deans to file his amended complaint, or
11 otherwise possibly narrow the scope of the claims for relief in his amended complaint.

12 6. During these settlement discussions, Plaintiff Deans and the College of Southern
13 Nevada, Antonia Marie Summerlin, and Randall Perkins ("The CSN Parties") filed their
14 Stipulation of Dismissal as to The CSN Parties (ECF No. 31), which was ratified by the Court
15 that same day (ECF No. 32).

16 7. On December 16, 2016, Plaintiff submitted a formal settlement proposal to
17 Defendant Las Vegas-Clark County Library District.

18 8. Defendant Las Vegas-Clark County Library District can respond to a settlement
19 proposal only through its Board of Trustees, who meet next on January 12, 2017.

20 9. Incurring additional costs and fees prior to January 12, 2017 would, at this point,
21 be counterproductive to settlement.

22 10. The Parties believe that there is good cause for the Court to grant their request for
23 an extension of time in order for the Parties to continue settlement discussions. The Parties
24 further believe that such an extension would be in the interest of judicial economy.

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1 **ACCORDINGLY**, the Parties stipulate and agree that the schedule should be modified
2 as follows:

3 a. The Parties will continue to engage in settlement discussions, and if the Parties
4 are unable to resolve the case by then, Mr. Deans shall file his amended complaint on or before
5 February 15, 2017.

6 b. Any remaining Defendants shall file their responsive pleadings by March 10,
7 2017.

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9 Dated: December 29, 2016.

10 Respectfully submitted,

11 /s/ Marc J. Randazza

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Respectfully submitted,

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IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

Dated: 12/29/2016